

EXHIBIT D

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Drew J. Ribar,
Plaintiff,

v.

State of Nevada ex rel. Nevada Department of Corrections, Carson City, et al.,
Defendants.

Case No. 3:24-cv-00103-ART-CLB

EXHIBIT D – Prisoner Compartment Camera Footage

Filed in Support of Amended Complaint and Summary Judgment Motion (Fed. R. Civ. P. 56)

Plaintiff **Drew J. Ribar**, *pro se*, submits Exhibit D, prisoner compartment camera footage from Deputy Jason Bueno's patrol vehicle on **August 30, 2022**, obtained via discovery in **Case No. 22 CR 01231 1C** (dismissed). Filed on USB per **LR IC 2-2** with a Notice of Manual Filing, this exhibit supports Plaintiff's claims and Rule 56 motion.

Key Evidence and Legal Violations

	Timestamp	Incident	Legal Relevance	Cross-Reference
1				
2				
3				
4	0:05:26–	Plaintiff enters vehicle;	Establishes baseline for heat distress	
5			under <i>Kingsley v. Hendrickson</i> , 576 U.S.	
6	0:05:30	shirt, face, neck dry.	389 (2015).	
7		Plaintiff requests cameras	Violates First Amendment recording	
8			rights per <i>Fordyce v. Seattle</i> , 55 F.3d 436	
9	0:05:43–	on; Deputy Palamar		
10	0:05:51	refuses; Plaintiff cites	(9th Cir. 1995); <i>Glik v. Cunniffe</i> , 655	
11		<i>Fordyce, Irizarry</i> .	F.3d 78 (1st Cir. 2011).	
12				
13	0:07:52–	Five unanswered sergeant	Denies procedural due process under	
14	0:08:00	requests.	<i>Mathews v. Eldridge</i> , 424 U.S. 319	
15			(1976).	
16		“Right in front of visitor		
17	0:08:40–	center you can’t take	Supports First Amendment public forum	
18	0:08:45	pictures?”	rights per <i>Fordyce</i> .	
19				
20	0:09:14–		Initiates Eighth Amendment distress per	
21		Sweat spot forms on chest.	<i>Hope v. Pelzer</i> , 536 U.S. 730 (2002);	
22	0:09:20		<i>Estelle v. Gamble</i> , 429 U.S. 97 (1976).	
23				
24	0:10:28–	Window rolled up, door	Constitutes inhumane confinement under	
25			<i>Hope</i> ; <i>Youngberg v. Romeo</i> , 457 U.S. 307 Exhibit C	
26	0:10:33	slams.	(1982); NRS 200.481 (battery).	
27				
28				

Timestamp	Incident	Legal Relevance	Cross-Reference
		Demonstrates deliberate indifference	
0:10:40–	“They’re trying to hot box	under <i>Kingsley</i> ; <i>Wilson v. Seiter</i> , 501	
0:10:45	me”; sweat spot grows.	U.S. 294 (1991); NRS 197.200	
		(oppression).	
0:19:44–	No arrest notice; no	Violates Fourth Amendment (<i>Devenpeck</i>	
0:19:55	seatbelt as transport	<i>v. Alford</i> , 543 U.S. 146 (2004)); Eighth	
	begins.	Amendment reckless disregard (<i>Hope</i>).	
		Breaches Fifth Amendment (<i>Miranda v.</i>	
0:20:56–	Late Miranda; no	<i>Arizona</i> , 384 U.S. 436 (1966)); Fourth	
0:21:05	obstruction answer.	Amendment (<i>Thompson v. Clark</i> , 142 S.	
		Ct. 1332 (2022)); NRS 200.460 .	
0:21:35–	Neck wet, shirt soaked.	Confirms severe heat distress under	
0:21:40		<i>Hope</i> ; <i>Estelle</i> ; NRS 200.481 (battery).	
0:33:23–	Exits unseatbelted after	Demonstrates reckless endangerment	
0:33:30	transport at highway	under <i>Kingsley</i> ; NRS 207.190 (coercion).	
	speeds.		

Summary Judgment Purpose

1 These **undisputed facts**—hotboxing admission (0:10:40), visible sweating progression
2 (0:09:14–0:21:35), window closure (0:10:28), and no seatbelt risking injury at highway speeds
3 (0:19:55–0:33:23)—violate **clearly established law** (*Fordyce, Hope, Devenpeck*), defeating
4 **qualified immunity** (*Harlow v. Fitzgerald*, 457 U.S. 800 (1982)). Defendants’ potential
5 “necessity” defense fails against *Kingsley*’s **objective unreasonableness** standard.
6

7 8 9 **State Law Claims**

10
11 This conduct also violates **Nevada law**, including **false imprisonment** (NRS 200.460), **battery**
12 (NRS 200.481), **coercion** (NRS 207.190), and **oppression under color of law** (NRS 197.200),
13 actionable under **28 U.S.C. § 1367**.
14

15 16 17 **Authentication**

18
19 Per **Fed. R. Evid. 901, I, Drew J. Ribar**, declare under **penalty of perjury** that this footage
20 accurately depicts my confinement on **August 30, 2022**.
21

22 **Dated:** March 27, 2025

23 **/s/ Drew J. Ribar**

24 Drew J. Ribar

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26
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28 PLEADING TITLE - 5